

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. No. 99-271

Comments by AT&T Communications of New England, Inc.,
Regarding KPMG's Exception No. 1

KPMG Exception No. 1: KPMG did not receive Daily Usage Feed (DUF) files from Bell Atlantic-Massachusetts (BA-MA) in a manner consistent with BA-MA documentation.

Domain: Billing

KPMG Assessment: KPMG's experience in receiving DUF files is inconsistent with Bell Atlantic's documented DUF delivery timeframes. Without the timely receipt of access DUF files, rating and billing to end user accounts cannot be performed.

Date of Exception: January 18, 2000

Date of BA Response: January 25, 2000

Date of AT&T Comments: February 4, 2000

AT&T Comments:

AT&T has had similar experiences as KPMG in the establishment of its formalized process for receiving Daily Usage Feed ("DUF") files, which are necessary if a CLEC is to bill its customers. Unlike KPMG, however, AT&T did not get a resolution on any of its problems for several months. AT&T continues to have problems with untimely DUF files from Bell Atlantic ("BA"). Furthermore, Bell Atlantic's DUF files for AT&T continue to be plagued by inaccuracy and incompleteness.

In May to late July of 1999, AT&T had a similar experience during the initial phases of establishing a formalized process for the receipt of DUF files. Despite numerous requests by AT&T to receive DUF files over NDM, BA continued to put AT&T's DUF files on cartridge tapes. Whereas it appeared that BA was able to correct the human error KPMG experienced in two days, it took AT&T more than two months to get Bell Atlantic resolve the issue of cartridge versus electronic feed of the Local Daily Usage files. This is because Bell Atlantic has a process in place, from which it does not deviate, that requires changes to established processes to be put in queue some 45 to 60 days in advance of a release. In other words, BA has regularly scheduled releases and unless an error is identified before the 45 to 60 day window, that error will continue until, perhaps, the next cycle of releases. Nowhere in Bell Atlantic's documentation was it written that there was a 45-60 day window to work DUF changes. AT&T only learned about this timeline through its attempts to resolve the DUF production problems with Bell Atlantic.

AT&T Continues to Receive Untimely DUF Data: Today, AT&T receives DUF files on a daily basis each business day. The content of these files is not always timely, though files do arrive each day. When DUF files are not received on a timely basis, a CLEC stands the risk of foregoing billing (to its detriment) or overbilling a customer (to the customer's dissatisfaction). For example, in New York, beginning with the August Bell Atlantic release and even after its October release, AT&T experienced three serious Bell Atlantic-generated problems. These problems prevented AT&T from successfully receiving and processing the Local DUF usage. As a result, the customers taking advantage of AT&T's local service offer could be billed only for the flat fees that they pay under the offer for their fixed block of time for local calling minutes per month. The customer could not be billed for usage-based charges that they otherwise would have paid, including the charges for use of more than the fixed block of minutes per month, etc, had AT&T received a timely and accurate DUF file. AT&T had to forego its usage revenue by not billing the customer since it would destroy goodwill to backbill the customer for mid-August to mid- October usage. Such billing could have resulted in an overcharge because of the type of local services plan to which the customer subscribed.

Bell Atlantic's DUF files Contain Incomplete and Inaccurate Data: Even if BA delivers its DUFs on a timely basis, there remains a major issue with files that contain incomplete or inaccurate data. BA should not be able to claim that it meets a timeliness metric if in fact the data contained within the files does not follow industry standards for EMI and is then subject to major reconciliation, modifications and corrections. Such issues usually do not get resolved in a timely manner or without escalation, thereby making BA's timeliness metric meaningless.

For example, DUFs are incomplete when they do not include such records as "Category 1" billing for such "In-Collect" matters as operator-assisted calls, collect calls, third-party calls and directory assistance calls. AT&T experienced this in New York. Bell Atlantic did not provide 800 terminated calls in the DUF until after their November release.

In addition, DUFs are inaccurate when they do not follow the industry standards either for the Local usage DUF or the UNE Access DUF. DUFs are inaccurate when, for example, BA erroneously identifies itself as a "Billing RAO" rather than a "From RAO". Another example is where AT&T received DUFs that did not include access usage charges and for which it was unable to pay or collect access usage fees. Another example is the absence of Settlement Codes or correctly populated Conversation Minutes in the UNE Access file. In all instances, AT&T and other CLECs have to monitor and report the issues to Bell Atlantic. Bell Atlantic does not have a quality monitoring process for the DUFs.

Measuring the timeliness of DUF files is meaningless if the data is neither accurate nor complete. Further resolution would be required if a file is timely but inaccurate or incomplete. The CLEC still would be unable to use the data. DUFs must be not only timely, but also accurate and complete.